

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION**

JOE ANDREW SALAZAR,

Plaintiff,

v.

AT&T MOBILITY LLC,  
SPRINT/UNITED MANAGEMENT  
COMPANY,  
T-MOBILE USA, INC., and  
CELLCO PARTNERSHIP D/B/A VERIZON  
WIRELESS,

Defendants.

Civil Action No. 5:19-cv-75

**JURY TRIAL DEMANDED**

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL**

Defendants AT&T Mobility LLC, Sprint/United Management Company, T-Mobile USA, Inc., and Cellco Partnership d/b/a Verizon Wireless (collectively "Defendants") hereby submit this Motion for Leave to File Under Seal its Joint Motion to Dismiss Under Rule 12(b)(6) ("Motion to Dismiss").

The Motion to Dismiss contains information that has been designated "RESTRICTED – ATTORNEY' EYES ONLY" or similar by Defendant HTC Corp. and sealed briefing referring to those materials in the prior lawsuit, *Salazar v. HTC Corp.*, No. 2:16-cv-1096 (E.D. Tex.). Counsel for the parties have met and conferred on this issue, and Plaintiff indicated he will not oppose this motion. Accordingly, this motion is UNOPPOSED. Defendants therefore respectfully request that the Court seal their Motion to Dismiss.

Dated: October 1, 2019

Respectfully submitted,

/s/ Fred I. Williams

Fred I. Williams  
Texas Bar No. 00794855  
fwilliams@velaw.com  
VINSON & ELKINS LLP  
2801 Via Fortuna, Suite 100  
Austin, Texas 78701  
Tel: 512.542.8400  
Fax: 512.542.8610

Todd E. Landis  
Texas Bar No. 24030226  
tlandis@velaw.com  
VINSON & ELKINS LLP  
2001 Ross Avenue, Suite 3700  
Dallas, TX 75201  
Tel: 214.220.7700  
Fax: 214.220.7716

Parker Hancock  
Texas Bar No. 24108256  
phancock@velaw.com  
VINSON & ELKINS LLP  
1001 Fannin Street, Suite 2500  
Houston, TX 77002-6760  
Tel: 713.758.2222  
Fax: 713.758.2346

Harry Lee Gillam, Jr.  
State Bar No. 07921800  
gil@gillamsmithlaw.com  
GILLAM & SMITH, LLP  
303 South Washington Avenue  
Marshall, Texas 75670  
Tel: 903.934.8450  
Fax: 903.934.9257

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 1st day of October, 2019, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Fred I. Williams

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h), and this motion is UNOPPOSED. The personal conference required by Local Rule CV-7(h) was conducted via telephone conference on October 1, 2019 between Parker Hancock, counsel for Defendants, and Goeff Culbertson, counsel for Plaintiff.

/s/ Fred I. Williams

Fred I. Williams